

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES
ASSOCIATION,

Plaintiff,

v.

NATIONAL NURSES UNITED, AFL-CIO

Defendant

Civil Action No. 15-11804

**PARTIES' JOINT PROPOSED RULE 16(b)(3) SCHEDULING
ORDER/PROPOSED PRE-TRIAL SCHEDULE**

Pursuant to FRCP 16(b)(3) and Local Rule 16.1(d) and the Court's order of October 1, 2015, the parties propose the following scheduling order:

(A) Required Contents.

1. Joinder of other parties: No further joinder is anticipated.
2. Amend the pleadings: No amendments are anticipated.
3. Complete discovery: No discovery will be conducted unless directed by the Court under Rule 56(d)(2).
4. Filing of motions: Summary judgment motions filed by October 30, 2015; oppositions to same by November 13, 2015.

(B) Permitted Contents.

1. Disclosures under Rules 26(a) and 26(e)(1) to be made by October 30, 2015.
2. Setting dates for pretrial conferences: Should the motions for summary judgment not fully dispose of the case, the

parties request that the Court schedule and conduct a pretrial conference.

C. Local Rule 16.1(d) Certifications

Pursuant to Local Rule 16.1(D)(3), the parties certify that counsel and their clients have conferred regarding budgets for litigation and alternative dispute resolution. The certifications will be filed under separate cover.

For the plaintiff, Massachusetts
Nurses Association,

For the Defendant, National Nurses
United, AFL-CIO,

By its attorneys,

By its attorneys,

/s/ James F. Lamond

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Date: October 15, 2015

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CERTIFICATE OF SERVICE

I, James F. Lamond, hereby certify that I have this day by the Electronic Case File system) served a copy of the foregoing Parties' Joint Proposed Rule 16(b)(3) And Local Rule 16.1(d) Scheduling Order/Proposed Pre-Trial Schedule upon Michael T. Anderson, (manderson@murphypllc.com) Murphy Anderson PLLC 111 Devonshire St. 5th Floor, Boston, Massachusetts 02109.

Dated: October 15, 2015

/s/ James F. Lamond
James F. Lamond